



**UNITED STATES ENVIRONMENTAL PROTECTION  
AGENCY  
REGION 10**

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Seattle, WA 98101-3140

OFFICE OF  
WATER AND  
WATERSHEDS

June 21, 2013

Ms. Stephanie Ogle, P.E.  
Department of Ecology  
Industrial Section  
PO Box 47600  
Olympia, WA 98504-7600

Re: U.S. Environmental Protection Agency Comments  
Draft National Pollutant Discharge Elimination System Permit (NPDES) and Fact  
Sheet Port Townsend Paper Corporation, NPDES Permit WA0000922

Dear Ms. Ogle:

The EPA has selected to review the above-referenced permit consistent with the Performance Partnership Agreement (PPA) and the EPA's obligation to oversee implementation of the NPDES program by delegated states. The EPA reviewed the draft permit for consistency with federal laws and regulations and with Ecology's regulations and permit writing guidance.

Port Townsend Paper Corporation operates a large industrial wastewater treatment plant (WWTP) and a small sanitary WWTP that discharge to Port Townsend Bay near Port Townsend, WA. The stated industrial wastewater discharge is 12 million gallons per day. Additionally, the facility discharges non-contact cooling water through two separate outfalls. Treated sanitary wastewater is monitored prior to combining with the industrial process wastewater stream and subsequent discharge.

The EPA has the following comments on the draft permit during the public comment period ending June 21, 2013.<sup>1</sup>

The EPA acknowledges the incorporation of additional study requirements beyond those required by Federal NPDES regulations including receiving water and ground water studies, sediment monitoring, outfall evaluation and an odor minimization evaluation report. As stated in the fact sheet, these studies will be used to assess further environmental impacts of the discharges. We appreciate the value of these studies to determine additional environmental protections warranted in future permits.

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<sup>1</sup> Draft Fact Sheet at

[http://www.ecy.wa.gov/programs/swfa/industrial/IND\\_PERMITS/DraftPermits/PTPCFSDraft13.pdf](http://www.ecy.wa.gov/programs/swfa/industrial/IND_PERMITS/DraftPermits/PTPCFSDraft13.pdf)

Draft Permit at

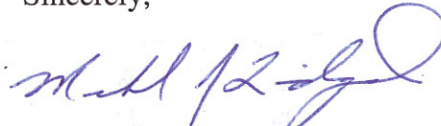
[http://www.ecy.wa.gov/programs/swfa/industrial/IND\\_PERMITS/DraftPermits/PTPCNPDESDraft13.pdf](http://www.ecy.wa.gov/programs/swfa/industrial/IND_PERMITS/DraftPermits/PTPCNPDESDraft13.pdf)

Effluent limitations for the sanitary wastewater discharge (internal outfall no. 5) are not consistent with Ecology guidelines for permitting domestic wastewater. In addition to the concentration-based effluent limits for total suspended solids (TSS) and biochemical oxygen demand (BOD<sub>5</sub>), Ecology guidelines and federal regulations required mass-based limits when practicable.<sup>2</sup> The EPA recommends the addition of mass-based effluent limits for TSS and BOD<sub>5</sub> consistent with Ecology's permitting practices for domestic dischargers and to prevent excessive mass loading in the event of high effluent flows, those exceeding the design flow rate.

The fact sheet states that the effluent limitations for chlorine for the sanitary wastewater discharge are water quality-based (WQBEL).<sup>3</sup> The fact sheet does not present the calculations documenting the established WQBELs for chlorine of 0.1 mg/L as a daily minimum and 5.0 mg/L daily as a maximum. Ecology's guidance establishes technology-based effluent limitations (TBEL) for chlorine in domestic wastewater as 0.5 mg/L for the monthly average, and 0.75 mg/L for the weekly average.<sup>4</sup> Federal regulations require permits to incorporate the more stringent limitations. The EPA recommends Ecology's established TBELs for chlorine is imposed unless calculated WQBELs are found to be more stringent.

Please contact me at (206) 553-1755 or by email at [lidgard.michael@epa.gov](mailto:lidgard.michael@epa.gov) if you have any questions about this letter or related matters, or you may contact Karen Burgess of my staff at (206) 553-1644 or by email: [burgess.karen@epa.gov](mailto:burgess.karen@epa.gov).

Sincerely,



Michael J. Lidgard, Manager  
NPDES Permits Unit

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<sup>2</sup> Federal NPDES Regulations 40 CFR § 122.45(f)(1).

<sup>3</sup> Draft Fact Sheet, p. 41.

<sup>4</sup> Ecology's permit and fact sheet template for domestic wastewater facilities.